

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VISTRA TRUST COMPANY (JERSEY) LIMITED AS  
TRUSTEE OF THE ALSAM, COLLEEN, AND  
LOGANY SETTLEMENTS, COLLEEN  
INVESTMENT AG, ALSAM HOLDING AG, PENNY  
ASSET AG, LOGANY EQUITY AG,  
VIERWALDSTATTER BETEILIGUNGEN AG,  
CLARICK AG, COLLEEN INVESTMENT, L.L.C.,  
LOGANY, L.L.C., and WILLIAM R. TACON,  
RECEIVER AND MANAGER OF THE ASSETS OF  
MAYTOWN UNIVERSAL SA AND PLYMPTON  
UNIVERSAL SA,

Plaintiffs,

-against-

DR. MARCO STOFFEL, ALBE ASSOCIATES  
LIMITED, BLUECOLT SECURITIES  
CORPORATION, LAURAMCA HOLDINGS, L.L.C.,  
and JOHN DOES 1-10,

Defendants.

Case No. 08 CV 02844

**NOTICE OF MOTION TO  
REMAND**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Scott S. Balber, sworn to April 17, 2008, and the exhibits thereto, and the annexed Declaration of Professor Stephen Berti, sworn to April 16, 2008, and the exhibits thereto, and upon all the prior pleadings and proceedings had herein, Plaintiffs will move this Court before the Honorable Naomi R. Buchwald, on May 19, at 9:30 a.m., or as soon thereafter that counsel can be heard, at the United States Courthouse located at 500 Pearl Street, New York, New York, for an order remanding this action to the Commercial Division of the New York Supreme Court, New York

County, pursuant to 28 U.S.C. § 1447(c) and for lack of subject matter jurisdiction, and granting Plaintiffs reasonable costs and attorneys' fees incurred as a result of removal pursuant to 28 U.S.C. § 1447(c), and such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
April 17, 2008

CHADBOURNE & PARKE LLP

By 

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Attorneys for Plaintiffs Vistra Trust

Company (Jersey) Limited as Trustee of the

Alsam, Colleen and Logany Settlements,

Colleen Investment AG, Alsam Holding

AG, Penny Asset AG, Logany Equity AG,

Vierwaldstatter Beteiligungen AG, Clarick

AG, Colleen Investment, L.L.C., Logany,

L.L.C., and William Tacon, Receiver and

Manager of the Assets of Maytown

Universal SA and Plympton Universal SA

To: HUGHES HUBBARD & REED LLP

Attorneys for Defendants Dr. Marco

Stoffel and Lauramca Holdings, L.L.C.

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